

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NESSA RISLEY, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

UNIVERSAL NAVIGATION INC. dba UNISWAP
LABS, HAYDEN Z. ADAMS, PARADIGM
OPERATIONS LP, AH CAPITAL
MANAGEMENT, L.L.C. dba ANDREESSEN
HOROWITZ, and UNION SQUARE VENTURES,
LLC,

Defendants.

No. 1:22-cv-02780-KPF

Honorable Katherine Polk Failla

**[PROPOSED] ORDER APPOINTING LEAD PLAINTIFFS
AND APPROVING SELECTION OF CO-LEAD COUNSEL**

On this ____ day of _____ 2022, the Court considered Nessa Risley, James Freeland, Robert Scott, Annie Venesky, Andrew Cardis, and Dean Meyers's Motion for Appointment of Lead Plaintiffs and Approval of Selection of Co-Lead Counsel in the above-captioned action pursuant to the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. §§ 77z-1(a)(3)(B)(i), 78u-4(a)(3)(B)(i). Having considered the Motion, and the materials submitted in support thereof, the Motion is **GRANTED**.

IT IS HEREBY ORDERED THAT:

1. Nessa Risley, James Freeland, Robert Scott, Annie Venesky, Andrew Cardis, and Dean Meyers are appointed lead plaintiffs in the above-captioned action.
2. The Court designates the law firms Kim & Serritella LLP and Barton LLP as co-lead counsel in this action.
3. Co-Lead counsel shall be generally responsible for coordinating activities during pretrial

proceedings and shall:

- a. Determine and present (in briefs, oral argument, or other fashion as may be appropriate, personally or by a designee) to the Court and opposing parties, the position of lead plaintiffs and the proposed class on all matters arising during pretrial proceedings;
 - b. Coordinate the conduct of discovery on behalf of lead plaintiffs and the proposed class consistent with the requirements of Rule 26 of the Federal Rules of Civil Procedure, including preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
 - c. Conduct settlement negotiations on behalf of lead plaintiffs and the proposed class;
 - d. Enter into stipulations with opposing counsel as necessary for the conduct of the litigation;
 - e. Prepare the case for and conduct trial; and
 - f. Perform such other duties as may be incidental to the proper coordination of pretrial and trial activities or as authorized by future order of the Court.
4. All securities class actions raising similar claims subsequently filed in, or transferred to, the United States District Court for the Southern District of New York shall be consolidated into this action, and this Order shall apply to every such action, absent any further order of the Court.

Dated _____, 2022

Katherine Polk Failla
United States District Judge